

## **PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT**

Aristokraft Plant #2  
One MasterBrand Cabinets Drive  
Jasper, Indiana 47546

and

Decora Plant #3A  
One MasterBrand Cabinets Drive  
Jasper, Indiana 47546

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T037-5929-00015	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary wood furniture manufacturing operation.

Responsible Official: Mr. Kurt Wanninger  
Source Address: Aristokraft Plant 2 is located at One MasterBrand Cabinets Drive, Jasper, Indiana 47546; and  
Decora Plant 3A is located at One MasterBrand Cabinets Drive, Jasper, Indiana 47547.  
Mailing Address: One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana 47546  
SIC Code: 2434, 2517  
County Location: Dubois  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

#### (1) Surface coating operations, identified as:

##### (a) Ten (10) surface coating operations located in Plant #2:

- (i) Two (2) electrostatic disc sealer booths, constructed in March 1986, identified as SB6 and SB7, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks S1 and S2.
- (ii) Two (2) electrostatic disc stain booths, constructed in March 1986, identified as STB2 and STB3, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks ST2 and ST1.
- (iii) Two (2) electrostatic disc topcoat booths, constructed in March 1986, identified as TCB10 and TCB11, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks TC1 and TC2.
- (iv) One (1) toner booth, constructed in March 1986, identified as TB1, using high volume low pressure (HVLP) spray guns and electrostatic guns (air assisted airless), with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stack T1.
- (v) One (1) sealer touch-up booth, constructed in May 1993, identified as SB8, using high volume low pressure (HVLP) spray guns, with a

maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stack S3.

- (vi) One (1) topcoat touch-up booth, constructed in March 1986, identified as TCB9 and TCB12, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks TC4 and TC3.
- (vii) One (1) parts booth, constructed in 1986, identified as PB13, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks P1 and P2.

(2) Woodworking operations, identified as:

- (a) Woodworking operations, located in Decora Plant #3A, identified as MC3, equipped with a baghouse for particulate control with a maximum capacity of 61,000 acfm and 0.01 gr/dscf, and exhausting to stack C2.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) UV Vacuum Coater Line, identified as UVC26, with a maximum capacity of 300 wood moldings per hour.
- (b) The following equipment related to the manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (c) Woodworking operations, identified as:
  - (i) Woodworking operations located at Plant #2, constructed in 1974, identified as MC14, with a maximum capacity of 5,950 pounds of wood per hour and equipped with a baghouse for particulate control with a maximum capacity of 35,000 acfm and 0.01 gr/dscf, and exhausting to stack C1.
  - (ii) Woodworking operations located at Decora Plant #3A, constructed in 1979, identified as MC2, with a maximum capacity of 10,710 pounds of wood per hour and equipped with a baghouse for particulate control with a maximum capacity of 35,000 acfm and 0.01 gr/dscf, and exhausting to stack C1.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

A.5 Source Determination

This source has been determined to be one source based on contiguous properties, having the same SIC codes and owned by one (1) company. There will be one plant identification number: 037-00015 and one Part 70 Operating Permit number: 037-5929.

## SECTION B

## GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled ~~A~~Permit Shield.@

### B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### B.4 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the ~~A~~responsible official@ as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the ~~A~~responsible official@ as defined by 326 IAC 2-7-1(34).

Permit Reviewer: Kimberly Titzer

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish record directly to the U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

- (1) Enforcement action;
- (2) Permit termination, revocation and reissuance, or modification; or
- (3) Denial of a permit renewal application.

- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source-s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.



- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the Aresponsible official@ as defined by 326 IAC 2-7-1(34).

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the Aresponsible official@ as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the Aresponsible official@ as defined by 326 IAC 2-7-1(34).

**B.13 Emergency Provisions [326 IAC 2-7-16]**

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an

action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management

Compliance Branch, Office of Air Management

100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the Responsible official as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any

emergency or upset provision contained in any applicable requirement.

- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superceded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the

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time the information was submitted.

- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation, except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the Responsible official as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the Responsible official as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the Responsible official as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
  - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
  - (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
  - (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.
- B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
  - (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application should be certified by the responsible official as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
  - (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]
- 
- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
  - (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable

requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
- (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (A) A brief description of the change within the source;
  - (B) The date on which the change will occur;
  - (C) Any change in emissions; and

- (D) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the Responsible official as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- B.22 Source Modification Requirement [326 IAC 2-7-10.5]  
A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-7-10.5.
- B.23 Inspection and Entry [326 IAC 2-7-6(2)]  
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:
- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]
- B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
- 
- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015



The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work

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or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

#### **Testing Requirements [326 IAC 2-7-6(1)]**

##### **C.8 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.  
A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted

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by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

##### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

Compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

##### **C.11 Monitoring Methods [326 IAC 3]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

#### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

##### **C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on July 13, 1999.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the Responsible official as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRPs shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Reasonable response steps that may be implemented in the event that

compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned or is returning to operating within Anormal@ parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
  - (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.
  - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.
- (c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the Aresponsible official@as defined by 326 IAC 2-7-1(34).

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the Aresponsible official@as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

**C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;

- (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the Aresponsible official® as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the Aresponsible official® as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the Aresponsible official® as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.



## **Stratospheric Ozone Protection**

### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

Surface coating operations, identified as:

- (a) Ten (10) surface coating operations located in Plant #2:
  - (i) Two (2) electrostatic disc sealer booths, constructed in March 1986, identified as SB6 and SB7, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks S1 and S2.
  - (ii) Two (2) electrostatic disc stain booths, constructed in March 1986, identified as STB2 and STB3, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks ST2 and ST1.
  - (iii) Two (2) electrostatic disc topcoat booths, constructed in March 1986, identified as TCB10 and TCB11, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks TC1 and TC2.
  - (iv) One (1) toner booth, constructed in March 1986, identified as TB1, using high volume low pressure (HVLP) spray guns and electrostatic guns (air assisted airless), with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stack T1.
  - (v) One (1) sealer touch-up booth, constructed in May 1993, identified as SB8, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stack S3.
  - (vi) One (1) topcoat touch-up booth, constructed in March 1986, identified as TCB12, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stack TC3.
  - (vii) One (1) parts booth, constructed in 1986, identified as PB13, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks P1 and P2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), sealer touch-up booth (SB8) surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating

Brush or Wipe Application  
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

All surface coating operations shall be limited to less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.3 Particulate Rules: Particulate Emissions Limitations [326 IAC 6-1-2]

- (a) Pursuant to 326 IAC 6-1-2, the particulate matter (PM) from the following spray booths shall be limited to 0.03 grain per dry standard cubic foot (dscf):
- (1) Two (2) electrostatic disc sealer booths, constructed in March 1986, identified as SB6 and SB7;
  - (2) Two (2) electrostatic disc stain booths, constructed in March 1986, identified as STB2 and STB3;
  - (3) Two (2) electrostatic disc topcoat booths, constructed in March 1986, identified as TCB10 and TCB11;
  - (4) One (1) toner booth, constructed in March 1986, identified as TB1;
  - (5) One (1) sealer touch-up booth, constructed in May 1993, identified as SB8;
  - (6) One (1) topcoat touch-up booth, constructed in March 1986, identified as TCB12;
  - (7) One (1) parts booth, constructed in 1986, identified as PB13.
- (b) Any change or modification which may increase the potential to emit of 250 tons per year or more of PM must be approved by the Office of Air Management before any such change may occur.

D.1.4 General Provisions Relating to HAPs [326 IAC 20-14][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-14, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.1.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
    - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for

on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

- (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
  - (D) Use a combination of (A), (B), and (C).
- (2) Limit VHAP emissions contact adhesives as follows:
- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.
  - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
  - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

**D.1.6 Work Practice Standards [40 CFR 63.803]**

The Permittee shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

**D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**Compliance Determination Requirements**

**D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)][40 CFR 63, Subpart JJ]**

Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

**D.1.9 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.1.10 VOC Emissions**

Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.11 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.12 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.5.
  - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
  - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
  - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
  - (4) The VHAP content in weight percent of each thinner used.

- (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (d) To document compliance with Condition D.1.6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.13 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.5 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

- (1) January 1 through June 30.
- (2) July 1 through December 31.
- (c) The reports required in (b) of this condition shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

## SECTION D.2

## FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Woodworking operations, identified as:

Woodworking operations, located in Decora #3A, identified as MC3, equipped with a baghouse for particulate control, with a maximum capacity of 61,000 acfm and 0.01 gr/dscf, and exhausting to stack C2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the particulate matter (PM) from the woodworking operations, identified as MC3, shall be limited to 0.03 grain per dry standard cubic foot (dscf).

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

#### D.2.3 Particulate Matter (PM)

The baghouse for woodworking operations MC3 being used for PM control shall be in operation at all times the woodworking operations are in operation and when exhausting to the atmosphere.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.2.5 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations, identified as MC3, when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

#### D.2.6 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.2.7 Record Keeping Requirements**

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhausts.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.



### SECTION D.3

### FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-7-5(15)] Insignificant Activities:

UV Vacuum Coater Line, identified as UVC26, with a maximum capacity of 300 wood moldings per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

##### D.3.1 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

All surface coating operations combined shall be limited to less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

##### D.3.2 General Provisions Relating to HAPs [326 IAC 20-14][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-14, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

##### D.3.3 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of Nov. 21, 1997.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
  - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
    - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
    - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
    - (D) Use a combination of (A), (B), and (C).
  - (2) Limit VHAP emissions contact adhesives as follows:
    - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.
    - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

**D.3.4 Work Practice Standards [40 CFR 63.803]**

The Permittee shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

**D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**Compliance Determination Requirements**

**D.3.6 Testing Requirements [326 IAC 2-7-6(1),(6)][40 CFR 632, Subpart JJ]**

Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

**D.3.7 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 and D.3.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.3.8 VOC Emissions**

Compliance with Condition D.3.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.3.9 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in

accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.3.10 Record Keeping Requirements**

- (a) To document compliance with Condition D.3.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Condition D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.3.3.
  - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
  - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
  - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
  - (4) The VHAP content in weight percent of each thinner used.
  - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;

- (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (d) To document compliance with Condition D.3.4, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.3.12 Reporting Requirements

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- (a) A quarterly summary of the information to document compliance with Conditions D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.3.3 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

- (1) January 1 through June 30.
  - (2) July 1 through December 31.
- (c) The report required in (b) of this condition shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] Insignificant Activities:

Woodworking operations, identified as:

- (1) Woodworking operations located at Plant #2, constructed in 1974, identified as MC14, equipped with a baghouse for particulate control, with a maximum capacity of 5,950 pounds of wood per hour and 35,000 acfm and 0.01 gr/dscf, and exhausting to stack C1.
- (2) Woodworking operations located at Decora Plant #3A, constructed in 1979, identified as MC2, equipped with a baghouse for particulate control, with a maximum capacity of 10,710 pounds of wood per hour and 35,000 acfm and 0.01 gr/dscf, and exhausting to stack C1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.4.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxx)]

The woodworking operations controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxx), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).
- (c) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
  - (1) The baghouse shall be inspected.
  - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

#### D.4.2 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the woodworking facilities shall be limited to 0.03 grain per dry standard cubic foot.

#### D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

#### D.4.4 Particulate Matter (PM) [326 IAC 2-7-21(1)(G)(xxx)(DD)]

The baghouses for PM control shall be in operation at all times when the woodworking facilities are in operation.

#### D.4.5 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxx)(FF)]

An inspection shall be performed each calendar quarter of all bags controlling the woodworking

operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

#### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

##### **D.4.6 Visible Emissions Notations**

Should the source elect to not have the woodworking operations considered an insignificant activity for Title V permitting purposes, the Method 22 readings required in Condition D.4.1(c) are not required, and will be replaced by the following:

- (a) Daily visible emission notations of each baghouse exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

##### **D.4.7 Broken or Failed Bag Detection**

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.4.8 Record Keeping Requirements**

- (a) To document compliance with Condition D.4.6, the Permittee shall maintain records of the results of the inspections required under Condition D.4.1(c) and Condition D.4.6 and the dates the vents are redirected.
- (b) To document compliance with Condition D.4.1(c) or Condition D.4.6, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust.

- (c) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxx)(GG)(dd).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**SECTION D.5**

**FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities:

The following equipment related to the manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.  
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.5.1 Particulate Matter (PM) [326 IAC 6-1-2]**

Pursuant to 326 IAC 6-1-2, the particulate matter (PM) from the manufacturing activities, identified as MC3, shall be limited to 0.03 grain per dry standard cubic foot (dscf).



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Aristokraft– Plant #2 and Decora Plant #3A  
Source Address: One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
Mailing Address: One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana, 47546  
Part 70 Permit No.: T037-5929-00015

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify)
- 9 Report (specify)
- 9 Notification (specify)
- 9 Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR MANAGEMENT**  
**COMPLIANCE DATA SECTION**  
**P.O. Box 6015**  
**100 North Senate Avenue**  
**Indianapolis, Indiana 46206-6015**  
**Phone: 317-233-5674**  
**Fax: 317-233-5967**

**PART 70 OPERATING PERMIT**  
**EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Aristokraft– Plant #2 and Decora Plant #3A  
Source Address: One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
Mailing Address: One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana, 47546  
Part 70 Permit No.: T037-5929-00015

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
<input checked="" type="radio"/>	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<input checked="" type="radio"/>	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Aristokraft– Plant #2 and Decora Plant #3A  
Source Address: One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
Mailing Address: One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana, 47546  
Part 70 Permit No.: T037-5929-00015  
Facility: All surface coating operations (see D.1 and D.3)  
Parameter: VOC Limit  
Limit: 250 tons per year

YEAR:

Month	VOC (tons)	VOC (tons)	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on:

Submitted by:  
Title / Position:  
Signature:  
Date:  
Phone:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Aristokraft– Plant #2 and Decora Plant #3A  
Source Address: One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
Mailing Address: One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana, 47546  
Part 70 Permit No.: T037-5929-00015

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of Deviations</b>	<b>Date of each Deviation</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
Semi-Annual Report**

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: Aristokraft– Plant #2 and Decora Plant #3A  
Source Address: One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
Mailing Address: One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana, 47546  
Part 70 Permit No.: T037-5929-00015  
Facility: All Surface Coating (See Sections D.1 and D.3)  
Parameter: VOC and VHAPs - NESHAP  
Limit: (1) Finishing operations -1.0 lb VHAP/lb Solids  
(2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight  
(3) All other thinner mixtures - 10% VHAP content by weight  
(4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids  
(5) All other contact adhesives - 1.0 lb VHAP/lb Solids  
(6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: \_\_\_\_\_

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1.						
2.						
3.						
4.						
5.						
6.						

- 9 No deviation occurred in this six month period.  
9 Deviation/s occurred in this six month period.  
Deviation has been reported on:

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for a Part 70 Operating Permit

**Source Name:** Aristokraft– Plant #2 and Decora Plant #3A  
**Source Location:** One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
**County:** Dubois  
**SIC Code:** 2434, 2517  
**Operation Permit No.:** T037-5929-00015  
**Permit Reviewer:** Kimberly Titzer

On June 10, 1999, the Office of Air Management (OAM) had a notice published in the *The Herald*, Jasper, Indiana, stating that Aristokraft Inc. had applied for a Part 70 Operating Permit to operate wood furniture manufacturing facility. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 13, 1999, Aristokraft Inc. submitted comments on the proposed Part 70 permit. The summary of the comments is as follows (bolded language has been added, the language with a line through it has been deleted):

**Comment 1: Section A.2 Emission Units and Pollution Control Equipment:**

This section should be revised as follows:

(1) Surface coating operations, identified as:

(a) ~~Twelve (12)~~ **Ten (10)** surface coating operations located in Plant #2: (14<sup>th</sup> Street and Aristokraft Square, Jasper, Indiana 47547)

- (1) Two (2) **electrostatic disc** sealer booths, constructed in March 1986, identified as SB6 and SB7, using high volume low pressure (HVLP) spray guns, with emissions controlled by dry filters and exhausting to stacks S1 and S2.
- (2) Two (2) **electrostatic disc** stain booths, constructed in March 1986, identified as STB2 and STB3, using high volume low pressure (HVLP) spray guns, with emissions controlled by dry filters and exhausting to stacks ST2 and ST1.
- (3) Two (2) **electrostatic disc** topcoat booths, constructed in March 1986, identified as TCB10 and TCB11, using high volume low pressure (HVLP) spray guns, with emissions controlled by dry filters and exhausting to stacks TC1 and TC2.

- (4) One (1) toner booth, constructed in March 1986, identified as TB1, using high volume low pressure (HVLP) spray guns **and electrostatic guns (air assisted airless)**, with emissions controlled by dry filters and exhausting to stack T1.
- (5) One (1) sealer touch-up booth, constructed in May 1993, identified as SB8, using high volume low pressure (HVLP) spray guns, with emissions controlled by dry filters and exhausting to stack S3.
- (6) **One (1) Two (2)** topcoat touch-up booths, constructed in March 1986, identified as ~~TCB9 and TCB12~~, using high volume low pressure (HVLP) spray guns, with emissions controlled by dry filters and exhausting to stacks ~~TC4 and TC3~~.
- ~~(7) One (1) stain touch-up booth, constructed in March 1986, identified as STB4, using high volume low pressure (HVLP) spray guns, with emissions controlled by dry filters and exhausting to stack ST3.~~
- (8) One (1) ~~Be~~ parts booth, constructed in 1986, identified as PB13, using high volume low pressure (HVLP) spray guns, with emissions controlled by dry filters and exhausting to stacks P1 and P2.

We would also request that the grain loading specifications in paragraphs A.2(2)(a) and (b) be eliminated. While the baghouses can meet a 0.01 gr/dscf level, the applicable limit is 0.03 gr/dscf, and, therefore, including the grain loading specification in the description of these units will lead to confusion regarding applicable limits. This change should also be made to the facility descriptions found in section D.2 of the permit.

#### Response 1:

Facility descriptions are not federally enforceable, and a Facility Description Box is not a permit condition and is not federally enforceable. It is stated in Section A of every permit that facility descriptions in A.1 through A.3 are not federally enforceable. In order to avoid confusion on this issue, additional language will be added into every Facility Description Box contained in Section D to further clarify that facility descriptions are not federally enforceable. However, since the source has requested more specific descriptions of the emission units, the suggested changes have been made.

Since the grain loading of each baghouse is not a limit on those baghouses, but is used in the determination of potential emissions from the woodworking processes, the grain loading descriptions will remain in the permit. Also, the grain loading descriptions will remain in order to identify the woodworking operations as insignificant.

#### Comment 2: Condition B.10 Certification:

The condition as written appears overly broad. We would recommend that the following phrase be added to the beginning of the condition. *"Where specifically designated by this permit or required by an applicable requirement, application forms, reports,..."*

#### Response 2:

Although the language in Condition B.10(a) comes directly from 326 IAC 2-7-4(f), IDEM, OAM understands there may be some confusion of when a certification is required. Therefore, the condition will be changed to clarify when a certification is required. Condition B.10(a) has been changed to read as follows:

B.10 Certification **[326 IAC 2-7-5(3)(c)]**[326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) **Where specifically designated by this permit or required by an applicable requirement**, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, ~~and any other certification required under this permit,~~ shall state that, based on information and belief formed after reasonable inquiry, the



statements and information in the document are true, accurate, and complete.

**Comment 3: Condition B.14 Permit Shield:**

Since the wording of paragraph (b) of this condition is somewhat ambiguous with respect to whether former Construction Permit conditions, which are not included in this permit, may still be applicable, we would request that the condition be specifically amended to identify that all of the conditions in the previously issued construction and operating permits are superceded by this permit.

**Response 3:**

On July 28, 1998, the OAM was notified that the U.S. EPA would object to any Title V Operating Permit that superceded all previous construction permits. The U.S. EPA indicated that they believed that the authority for certain applicable requirements might expire if the construction permits that established them expired. The OAM believes that the regulatory process is best served if all affected parties are able to rely on the Title V Operating Permit to identify all applicable requirements and the means for demonstrating compliance with each requirement.

The OAM intends to continue discussions with the U.S. EPA regarding the issues related to past construction permits. However, the OAM also believes that the Permit Shield condition B.14 (b) (1) and (2) establishes that the Title V permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of the permit shall be deemed in compliance with any applicable requirements as of the date of the permit issuance for all previous permits identified by the source and the OAM during the course of this review.

B.14 language has been changes to read as follows:

**B.14 Permit Shield [326 IAC 2-7-15]**

- (a) ~~This condition provides a permit shield as addressed in 326 IAC 2-7-15. Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~

**This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.**

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. **All previously issued operating permits are superceded by this permit.** ~~Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:~~

~~(1) The applicable requirements are included and specifically identified in this permit;~~  
~~or~~

~~(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. **Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.**
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

**Comment 4: Condition C.12 Emergency Reduction Plans:**

Attached is an Emergency Reduction Plan for Plant 2 and 32, which we believe satisfies the requirement for such a plan. Please amend this condition to reflect that this plan has been submitted.

**Response 4:**

The following change has been made to the permit to clarify that Aristokraft has submitted an Emergency Reduction Plan.

---

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

~~(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.~~

~~(b) These ERPs shall be submitted for approval to:  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015~~

~~within ninety (90) days after the date of issuance of this permit.~~

~~The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~

- ~~(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~
- ~~(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~
- ~~(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]~~
- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on July 13, 1999.**
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.**
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.**
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.**
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]**

**Comment 5: Condition C.16 Compliance Monitoring Plan - Failure to Take Response Steps:**

We do not believe that 40 CFR Part 70, or 326 IAC 2-7 provides any authority to require the preparation of a Compliance Response Plan (CRP) or to establish the basis for a violation of the permit for failure to conduct the identified response steps. Failure to take specific response steps should not be interpreted in any way as evidence of non-compliance with an underlying applicable requirement, which is implied by this permit condition. We would request that all references to a Compliance Response Plan be eliminated from this condition.

**Response 5:**

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each Permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each Permittee's Annual Compliance Certification. Each Permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the Permittee's Preventive Maintenance Plan(PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the Permittee would take in the event an inspection indicated an "out of

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specification situation”, and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the Permittee’s equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a Permittee's maintenance staff handle the routine maintenance of the equipment, and a Permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comments sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a Permittee's PMP might call for the Permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the Permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the Permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the Permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most Permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The Permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the Permittee may know from experience, what replacement parts should be kept on hand. The Permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the Permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The Permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the Permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13) and for each FESOP permit pursuant to 326 IAC 2-8-4(9). Both of those rules refer back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most Permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's troubleshooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the Permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A Permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the Permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading (Guidance, page 13). Some of the terminology has changed, as a result of comments from regulated sources, but the requirements in the permit do not conflict with the guidance.

The Compliance Monitoring Plan language has been updated. The condition now reads as follows:

- C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]
- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. ~~The compliance monitoring plan is comprised of:~~ **The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:**

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRPs shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
  - (A) **Reasonable** response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
  - (B) A time schedule for taking ~~such~~ **reasonable** response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, ~~appropriate~~ **reasonable** response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to ~~perform the actions detailed in the compliance monitoring conditions or failure to take reasonable response steps within the time prescribed in the Compliance Response Plan~~ shall constitute a violation of the permit ~~unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.~~
- (c) ~~After investigating the reason for the excursion~~ **Upon investigation of a compliance monitoring excursion**, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) ~~The monitoring equipment malfunctioned, giving a false reading.~~ **A false reading occurs due to the malfunction of the monitoring equipment.** This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) **All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.**
- (f) **If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.**
  - (1) **At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.**
  - (2) **Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.**

**Comment 6: Condition D.1 Facility Description:**

Please refer to the revisions indicated in Section A.2 above.

**Response 6:**

The following changes were made to Section D.1 of the permit as a result of revisions to Section

A.2. Also, a clause has been added to the description box to clarify that language is descriptive only and not enforceable:

**SECTION D.1****FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] Surface coating operations, identified as:

**Ten (10) ~~Twelve (12)~~** surface coating operations located in Plant #2: (14<sup>th</sup> Street and Aristokraft Square, Jasper, Indiana 47547)

- (1) Two (2) **electrostatic disc** sealer booths, constructed in March 1986, identified as SB6 and SB7, using high volume low pressure (HVLP) spray guns, with emissions controlled by dry filters and exhausting to stacks S1 and S2.
- (2) Two (2) **electrostatic disc** stain booths, constructed in March 1986, identified as STB2 and STB3, using high volume low pressure (HVLP) spray guns, with emissions controlled by dry filters and exhausting to stacks ST2 and ST1.
- (3) Two (2) **electrostatic disc** topcoat booths, constructed in March 1986, identified as TCB10 and TCB11, using high volume low pressure (HVLP) spray guns, with emissions controlled by dry filters and exhausting to stacks TC1 and TC2.
- (4) One (1) toner booth, constructed in March 1986, identified as TB1, using high volume low pressure (HVLP) spray guns **and electrostatic guns (air assisted airless)**, with emissions controlled by dry filters and exhausting to stack T1.
- (5) One (1) sealer touch-up booth, constructed in May 1993, identified as SB8, using high volume low pressure (HVLP) spray guns, with emissions controlled by dry filters and exhausting to stack S3.
- (6) **One (1) ~~Two (2)~~** topcoat touch-up booths, constructed in March 1986, identified as ~~TCB9 and~~ TCB12, using high volume low pressure (HVLP) spray guns, with emissions controlled by dry filters and exhausting to stacks ~~TC4 and~~ TC3.
- (7) ~~One (1) stain touch-up booth, constructed in March 1986, identified as STB4, using high volume low pressure (HVLP) spray guns, with emissions controlled by dry filters and exhausting to stack ST3.~~
- (8) One (1) ~~Ball~~ parts booth, constructed in 1986, identified as PB13, using high volume low pressure (HVLP) spray guns, with emissions controlled by dry filters and exhausting to stacks P1 and P2.

**(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)**

**Comment 7: Condition D.1.11 Monitoring:**

We would request that this condition (as well as the associated recordkeeping requirements found in section D.1.12(a)) be eliminated from the permit. All of the surface coating booths have allowable PM emissions of less than 10 lbs/hour, and as such, we do not believe that compliance monitoring is warranted for these relatively small particulate sources.

**Response 7:**

The condition requires surface coating facilities to use dry filters as a control because OAM believes that daily inspections are necessary to ensure compliance with 326 IAC 6-3-2(c) (Particulate Emission Limitations). Therefore, the condition has not been changed. IDEM receives numerous complaints about overspray from this type of facility. The use and monitoring of the filters is necessary to ensure that the facility is operating correctly and that the ambient air quality standards set forth in 326 IAC 1-3 will be attained and/or maintained, and that the public health will be protected, as allowed by 326 IAC 2-1-5(a)(2). No changes were made as a result of this comment.

**Comment 8: Condition D.1.13 Reporting Requirements**

Paragraph (b) of this condition indicates that the initial compliance date for 40 CFR 63, Subpart JJ was December 7, 1998, and that an initial compliance report was due within six months of that date. The proper compliance date for our facility is November 21, 1997, and we did submit the initial compliance notification on January 21, 1998. We would request that condition D.1.13(b) be deleted from the permit.

**Response 8:**

The initial compliance date should have been November 21, 1999. Since, Aristokraft has complied with this date and has submitted the initial compliance notification, the permit condition has been removed from the permit as follows:

**D.1.13 Reporting Requirements**

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- (b) ~~An Initial Compliance Report to document compliance with Condition D.1.5 and the Certification form, shall be submitted within sixty (60) days following the compliance date of December 7, 1998. The Initial Compliance Report must include data from the entire month that the compliance date falls.~~

**Comment 9: Condition D.1.13(a) Reporting Requirements**

This condition requires a quarterly report of the information to document compliance with Condition D.1.3. Condition D.1.3 indicated that the particulate matter emissions from the spray booths are limited to 0.03 grain per dry standard cubic foot (gr/dscf). These surface coating booths PM emissions are less than 10 lbs/hour. Therefore, we believe that reporting of the PM emissions is not required. Please delete the reference to this condition as a reporting requirement.

**Response 9:**

The reference for quarterly reporting should not have included Condition D.1.3 with Conditions D.1.2 and D.1.5. The following change was made to the permit condition:

**D.1.13 Reporting Requirements**

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- (a) A quarterly summary of the information to document compliance with Conditions D.1.2, ~~D.1.3~~ and D.1.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**Comment 10: Conditions D.1.7 and D.2.2 Preventive Maintenance Plan:**

We would request that this condition be amended to read as follows: *"A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan of this permit, is required for the particulate control devices used for these emission units."* We believe that this language is more appropriate as it does not suggest that a preventative maintenance plan is required for the individual emission units themselves.

**Response 10:**

The requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required by 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits), to obtain a permit. Any preventive maintenance that could effect emissions from the facilities in question should be listed in the Preventive Maintenance Plan. This would include both the emission units, as well as the pollution control device. No changes were made as a result of this comment.

**Comment 11: Condition D.2.4 Visible Emission Notations:**

This condition requires daily visible emission notations for each of the woodworking baghouse stacks. We do not believe that daily visible emissions notations are necessary to verify compliance with 326 IAC 6-1-2 or proper operation. Weekly visible emissions notations would be sufficient to verify compliance. Therefore, we would request that only weekly visible emissions notations be required for the MC14 and MC2 woodworking operations.



**Response 11:**

The visible emission notations are used to indicate compliance with 326 IAC 5-1 and 326 IAC 6, without the requirement to have a person on site trained in opacity measurement. This requirement is designed as a trigger that the source perform some corrective action on the facility if visible emissions are abnormal, to ensure continuous compliance with emission limitations. Even though the cyclone may not be needed for the boiler to stay in compliance (when it is operating properly), visible emission observations are required. The woodworking operations do require the baghouses to stay in compliance. Therefore, the visible emission observations are required for the woodworking operations as well. There was no change made to the permit as a result of this comment.

**Comment 12: Condition D.2.5 Baghouse Inspections:**

We would request that this condition be eliminated, since the intent of this condition is already covered by other conditions, which may in fact conflict with this condition. Baghouse inspections should more appropriately be included under our Preventative Maintenance Plan, rather than be addressed as a specific permit condition. Again, if there is a specific applicable requirement for such inspections beyond the requirements for a Preventative Maintenance Plan, we would like to know the reference for such a requirement. No changes were made as a result of this comment.

**Response 12:**

326 IAC 2-7-5(3)(A) gives the OAM the authority to require any necessary compliance monitoring to ensure the source is in compliance with the Part 70 permit requirements. The OAM believes that quarterly baghouse inspections are necessary to ensure the control equipment is operating properly. No changes were made to the permit as a result of this comment.

**Comment 13: Conditions D.2.6 Broken Bag or Failure Detection:**

We would request that this condition be eliminated, since the intent of this condition is already covered by other conditions, which may in fact conflict with these conditions. The Emergency Provisions in Condition B.13 address situations such as the failure of control equipment. The requirements of this condition do not appear to be based on a specific applicable requirement and may, in fact, conflict with the requirements of condition B.13.

**Response 13:**

Pursuant to 326 IAC 2-7-5(1)(F), each Part 70 permit is required to contain conditions which minimize excess emissions to the extent feasible, caused by events such as bag failure. The requirements shall take into consideration available technologies, safety cost, and other relevant factors. The OAM believes the condition outlines reasonable actions to ensure compliance with the particulate matter limitations. No changes were made as a result of this comment. However, language for this condition has been updated. The following changes have been made to this condition:

**D.2.6 Broken Bag or Failure Detection**

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~For single compartment baghouses, failed units and the associated processes will be shut down immediately until the failed units have been repaired or replaced.~~ **Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the~~

~~failure and shall include a timetable for completion.~~ **For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

**Comment 14: Condition D.2.7 Record Keeping Requirements:**

Please revise the text to reflect weekly visible emissions notations, as requested in Condition D.2.5.

**Response 14:**

The visible emission notations are used to indicate compliance with 326 IAC 5-1 and 326 IAC 6, without the requirement to have a person on site trained in opacity measurement. This requirement is designed as a trigger that the source perform some corrective action on the facility if visible emissions are abnormal, to ensure continuous compliance with emission limitations. The woodworking operations do require the baghouses to stay in compliance. Therefore, the visible emission observations are required for the woodworking operations. There was no change to the permit to include weekly visible emissions notations, therefore, no change was made to the recordkeeping requirements condition of the permit.

**Comment 15: Condition D.2.9 Reporting Requirements:**

This condition requires a quarterly summary report of the information to document compliance with Condition D.2.1. Condition D.2.1 indicates that the particulate matter emissions from MC14 and MC2 woodworking operations are limited to 0.03 grain per dry standard cubic foot (gr/dscf). These woodworking operations are equipped with a particulate control (baghouse) with a maximum grain loading of 0.01 gr/dscf. Therefore, by design, the particulate emissions will be under the allowable limit. Thus, there is not need to submit quarterly reports to demonstrate compliance with Condition D.2.1. We request to have this condition removed.

**Response 15:**

The quarterly reporting for woodworking operations should not have been referenced in the permit, therefore, the following change was made to the permit:

~~D.2.9 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.~~

**Comment 16: Technical Support Document - Potential Emissions:**

Page 5 of the Technical Support Document indicates that our potential emissions of PM and PM10 are greater than 250 tons/year. It is unclear why the table uses "potential emissions" as defined by 326 IAC 1-2-55, since the applicability of the Part 70 regulations and the Prevention of Significant Deterioration (PSD) regulations are based on the definition of Potential to Emit as found at 326 IAC 2-7-1(29) and 326 IAC 2-2-1(u) respectively. We believe that our Potential to Emit PM and PM10 is clearly less than 100 tons/year based on the 0.03 gr/dscf limit found at 326 IAC 6-1. We would request that this portion of the Technical Support Document be amended to indicated that our Potential to Emit is less than 100 tons/year for PM and PM10.

**Response 16:**

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

As explained in the paragraph located above the "Potential Emissions" table:

"Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as emissions of any one (1)

pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

The potential particulate matter emissions calculations on pages 14-15 of the TSD show the potential emissions to be greater than 250 tons per year.

Also, “Potential to Emit,” pursuant to 326 IAC 2-7-1(29), means the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. This definition explains that the emissions are based on emissions without controls. Therefore, the emissions can not be less than 100 tons per year based on the 0.03 gr/dscf limit found at 326 IAC 6-1, because this limit is a baghouse limit. Without the baghouse, calculations show the emissions at greater than 250 tons per year.

**Comment 17: Technical Support Document - Insignificant Activities:**

The following insignificant activity needs to be added to the list of insignificant activities found in pages 2 and 3.

UV Vacuum Coater Line, identified as UVC26, with a maximum capacity of 300 wood moldings per hour.

We also request that the changes indicated in this letter be reflected in the Technical Support Document.

**Response 17:**

Information submitted by Aristokraft in the Title V Operating Permit Application was used in the development of the Title V Operating Permit. The UV Vacuum Coater Line, identified as UVC26 was not listed as an emission unit; therefore, it was not included. The following changes were made to the permit in order to include this emission unit:

- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]  
~~This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21) that have applicable requirements.~~

**This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):**

- (a) UV Vacuum Coater Line, identified as UVC26, with a maximum capacity of 300 wood moldings per hour.
- (b) The following equipment related to the manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (c) Woodworking operations, identified as:
  - (i) Woodworking operations located at Plant #2, constructed in 1974, identified as MC14, with a maximum capacity of 5,950 pounds of wood per hour and equipped with a baghouse for particulate control with a maximum capacity of 35,000 acfm and 0.01 gr/dscf, and exhausting to stack C1.
  - (ii) Woodworking operations located at Decora Plant #3A, constructed in 1979, identified as MC2, with a maximum capacity of 10,710 pounds of wood per hour and equipped with a baghouse for particulate control with a maximum capacity of 35,000 acfm and 0.01 gr/dscf, and exhausting to stack C1.

The following D-Section has been added for all rules applicable to the UV Vacuum Coater Line. Although VOC emissions are less than 15 pounds per day, 40 CFR 63, Subpart JJ still applies. Also, all surface coating operations combined shall be limited to less than 250 tons per year. Therefore, the following conditions apply to this emission unit:

## SECTION D.3

## FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities:

UV Vacuum Coater Line, identified as UVC26, with a maximum capacity of 300 wood moldings per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

All surface coating operations combined shall be limited to less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

#### D.3.2 General Provisions Relating to HAPs [326 IAC 20-14][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-14, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

#### D.3.3 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of Nov. 21, 1997.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
  - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
    - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
    - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
    - (D) Use a combination of (A), (B), and (C).
  - (2) Limit VHAP emissions contact adhesives as follows:
    - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not

exceed 1.8 pound VHAP per pound solids.

(B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

**D.3.4 Work Practice Standards [40 CFR 63.803]**

The Permittee shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

**D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**Compliance Determination Requirements**

**D.3.6 Testing Requirements [326 IAC 2-7-6(1),(6)][40 CFR 63, Subpart JJ]**

Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

**D.3.7 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 and D.3.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.3.8 VOC Emissions**

Compliance with Condition D.3.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.3.9 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.3.10 Record Keeping Requirements**

- (a) To document compliance with Condition D.3.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Condition D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.3.3.
  - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
  - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
  - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
  - (4) The VHAP content in weight percent of each thinner used.
  - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (d) To document compliance with Condition D.3.4, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.3.12 Reporting Requirements**

- (a) A quarterly summary of the information to document compliance with Conditions D.3.1 and D.3.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.3.3 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

- (1) January 1 through June 30.
  - (2) July 1 through December 31.
- (d) The report required in (a) of this condition shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

As a result of the addition of the UV booth, the following report was changed as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR MANAGEMENT**  
**COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT**  
**Semi-Annual Report**

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: Aristokraft– Plant #2 and Decora Plant #3A  
Source Address: One MasterBrand Cabinets Drive, Jasper, Indiana 47546  
Mailing Address: One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana, 47546  
Part 70 Permit No.: T037-5929-00015  
Facility: **All Surface Coating (See Sections D.1 and D.3)**  
Parameter: VOC and VHAPs - NESHAP  
Limit: (1) Finishing operations -1.0 lb VHAP/lb Solids  
(2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight  
(3) All other thinner mixtures - 10% VHAP content by weight  
(4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids  
(5) All other contact adhesives - 1.0 lb VHAP/lb Solids  
(6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: \_\_\_\_\_

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1.						
2.						
3.						
4.						
5.						
6.						

- 9 No deviation occurred in this six month period.  
9 Deviation/s occurred in this six month period.  
Deviation has been reported on:

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_



Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes.

- (1) Section A.2 and corresponding D-sections have been changed to reflect the maximum capacities of the emission units. The maximum capacities listed in the emission unit descriptions in A.1 through A.3 are used by IDEM OAM in order to completely describe the units and to assess the source's potential to emit. The process specific emissions limitations identified in Section D of the permit are often determined from this information. Physical changes or changes in the method of operation that changed the capacity may also increase the emission unit's potential to emit. Documenting the capacity will assist both the Permittee and the IDEM in evaluating whether such a change requires a preconstruction permit or other approval. If these capacities are not accurate, the source is required to notify IDEM OAM since this may change the applicability of the air permitting rules, and may result in an administrative amendment to the permit.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) Surface coating operations, identified as:
  - (a) Twelve (12) surface coating operations located in Plant #2: (14<sup>th</sup> Street and Aristokraft Square, Jasper, Indiana 47547)
    - (1) Two (2) electrostatic disc sealer booths, constructed in March 1986, identified as SB6 and SB7, using high volume low pressure (HVLP) spray guns, **with a maximum capacity of 4800 units per hour, and** with emissions controlled by dry filters and exhausting to stacks S1 and S2.
    - (2) Two (2) electrostatic disc stain booths, constructed in March 1986, identified as STB2 and STB3, using high volume low pressure (HVLP) spray guns, **with a maximum capacity of 4800 units per hour, and** with emissions controlled by dry filters and exhausting to stacks ST2 and ST1.
    - (3) Two (2) electrostatic disc topcoat booths, constructed in March 1986, identified as TCB10 and TCB11, using high volume low pressure (HVLP) spray guns, **with a maximum capacity of 4800 units per hour, and** with emissions controlled by dry filters and exhausting to stacks TC1 and TC2.
    - (4) One (1) toner booth, constructed in March 1986, identified as TB1, using high volume low pressure (HVLP) spray guns and electrostatic guns (air assisted airless), **with a maximum capacity of 4800 units per hour, and** with emissions controlled by dry filters and exhausting to stack T1.
    - (5) One (1) sealer touch-up booth, constructed in May 1993, identified as SB8, using high volume low pressure (HVLP) spray guns, **with a maximum capacity of 4800 units per hour, and** with emissions controlled by dry filters and exhausting to stack S3.
    - (6) One (1) topcoat touch-up booth, constructed in March 1986, identified as TCB9 and TCB12, using high volume low pressure (HVLP) spray guns, **with a maximum capacity of 4800 units per hour, and** with emissions controlled by dry filters and exhausting to stacks TC4 and TC3.
    - (7) One (1) parts booth, constructed in 1986, identified as PB13, using high volume low pressure (HVLP) spray guns, **with a maximum capacity of 4800 units per hour, and** with emissions controlled by dry filters and exhausting to stacks P1 and P2.

The following woodworking operations have been removed and transferred to the Insignificant Activities listed in Condition A.3, because Aristokraft Inc. has asked to have all woodworking controlled by a baghouse to be considered as insignificant activities.

~~(2) — Woodworking operations, identified as:~~

- ~~(a) — Woodworking operations located at Plant #2, constructed in 1974, identified as MC14, equipped with a baghouse for particulate control, with a maximum capacity of **5,950 pounds of wood per hour** and 35,000 acfm and 0.01 gr/dscf, and exhausting to stack C1.~~
- ~~(b) — Woodworking operations located at Plant #32 (One Aristokraft Square, Jasper, Indiana 47547), constructed in 1979, identified as MC2, equipped with a baghouse for particulate control, with a maximum capacity of **10,710 pounds of wood per hour** and 35,000 acfm and 0.01 gr/dscf, and exhausting to stack C1.~~

The following woodworking operations have been added to the source since the permit was on Public Notice. Since these operations cannot be considered as insignificant based on the grain loading of the baghouse greater than 0.003 gr/dscf. Therefore, the units have been added to Sections A.2 and D.2.

- (2) Woodworking operations, located in Decora #3A, identified as MC3, equipped with a baghouse for particulate control, with a maximum capacity of 61,000 acfm and 0.01 gr/dscf, and exhausting to stack C2.**

Section D.1 and D.2 were changed to incorporate the maximum capacities from Section A as follows:

**SECTION D.1 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] Surface coating operations, identified as:

Ten (10) surface coating operations located in Plant #2:

- (1) Two (2) electrostatic disc sealer booths, constructed in March 1986, identified as SB6 and SB7, using high volume low pressure (HVLP) spray guns, **with a maximum capacity of 4800 units per hour, and** with emissions controlled by dry filters and exhausting to stacks S1 and S2.
- (2) Two (2) electrostatic disc stain booths, constructed in March 1986, identified as STB2 and STB3, using high volume low pressure (HVLP) spray guns, **with a maximum capacity of 4800 units per hour, and** with emissions controlled by dry filters and exhausting to stacks ST2 and ST1.
- (3) Two (2) electrostatic disc topcoat booths, constructed in March 1986, identified as TCB10 and TCB11, using high volume low pressure (HVLP) spray guns, **with a maximum capacity of 4800 units per hour, and** with emissions controlled by dry filters and exhausting to stacks TC1 and TC2.
- (4) One (1) toner booth, constructed in March 1986, identified as TB1, using high volume low pressure (HVLP) spray guns and electrostatic guns (air assisted airless), **with a maximum capacity of 4800 units per hour, and** with emissions controlled by dry filters and exhausting to stack T1.
- (5) One (1) sealer touch-up booth, constructed in May 1993, identified as SB8, using high volume low pressure (HVLP) spray guns, **with a maximum capacity of 4800 units per hour, and** with emissions controlled by dry filters and exhausting to stack S3.

- (6) One (1) topcoat touch-up booth, constructed in March 1986, identified as TCB9 and TCB12, using high volume low pressure (HVLP) spray guns, **with a maximum capacity of 4800 units per hour, and** with emissions controlled by dry filters and exhausting to stacks TC4 and TC3.
- (7) One (1) parts booth, constructed in 1986, identified as PB13, using high volume low pressure (HVLP) spray guns, **with a maximum capacity of 4800 units per hour, and** with emissions controlled by dry filters and exhausting to stacks P1 and P2.

## SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

**Woodworking operations, identified as:**

**Woodworking operations, located in Decora #3A, identified as MC3, equipped with a baghouse for particulate control, with a maximum capacity of 61,000 acfm and 0.01 gr/dscf, and exhausting to stack C2.**

- (2) Section A.3 has been changed to add insignificant activities that are specifically regulated and a D-section has been added for the units as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) UV Vacuum Coater Line, identified as UVC26, with a maximum capacity of 300 wood moldings per hour.
- (b) **The following equipment related to the manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.**
- (c) **Woodworking operations, identified as:**
  - (1) **Woodworking operations located at Plant #2, constructed in 1974, identified as MC14, equipped with a baghouse for particulate control, with a maximum capacity of 5,950 pounds of wood per hour and 35,000 acfm and 0.01 gr/dscf, and exhausting to stack C1.**
  - (2) **Woodworking operations located in Decora #3A, constructed in 1979, identified as MC2, equipped with a baghouse for particulate control, with a maximum capacity of 10,710 pounds of wood per hour and 35,000 acfm and 0.01 gr/dscf, and exhausting to stack C1.**

The following Section has been created for the insignificant woodworking operations listed in Condition A.3.

## **SECTION D.4 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities:  
Woodworking operations, identified as:

- (1) Woodworking operations located at Plant #2, constructed in 1974, identified as MC14, equipped with a baghouse for particulate control, with a maximum capacity of 5,950 pounds of wood per hour and 35,000 acfm and 0.01 gr/dscf, and exhausting to stack C1.
- (2) Woodworking operations located in Decora #3A, constructed in 1979, identified as MC2, equipped with a baghouse for particulate control, with a maximum capacity of 10,710 pounds of wood per hour and 35,000 acfm and 0.01 gr/dscf, and exhausting to stack C1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### **D.4.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxx)]**

The woodworking operations controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxx), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).
- (c) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
  - (1) The baghouse shall be inspected.
  - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

#### **D.4.2 Particulate Matter (PM) [326 IAC 6-1-2]**

Pursuant to 326 IAC 6-1-2, the particulate matter (PM) from the woodworking operations shall be limited to 0.03 grain per dry standard cubic foot (dscf).

#### **D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### **Compliance Determination Requirements**

#### **D.4.4 Particulate Matter (PM) [326 IAC 2-7-21(1)(G)(xxx)(DD)]**

The baghouses for PM control shall be in operation at all times when the woodworking facilities are in operation.

#### **D.4.5 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxx)(FF)]**

An inspection shall be performed each calendar quarter of all bags controlling the

**woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.**

#### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

##### **D.4.6 Visible Emissions Notations**

**Should the source elect to not have the woodworking operations considered an insignificant activity for Title V permitting purposes, the Method 22 readings required in Condition D.4.1(c) are not required, and will be replaced by the following:**

- (a) Daily visible emission notations of each baghouse exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.**
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.**
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.**
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.**
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.**

##### **D.4.7 Broken or Failed Bag Detection**

**In the event that bag failure has been observed:**

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

#### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.4.8 Record Keeping Requirements**

- (a) To document compliance with Condition D.4.6, the Permittee shall maintain records of the results of the inspections required under Condition D.4.1(c) and Condition D.4.6 and the dates the vents are redirected.**

- (b) **To document compliance with Condition D.4.1(c) or Condition D.4.6, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust.**
- (c) **The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxx)(GG)(dd).**
- (d) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

The following section has been created for the equipment listed in Condition A.3:

#### **SECTION D.5 FACILITY OPERATION CONDITIONS**

##### **Facility Description [326 IAC 2-7-5(15)] Insignificant Activities:**

**The following equipment related to the manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.**

**(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)**

#### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

##### **D.5.1 Particulate Matter (PM) [326 IAC 6-1-2]**

**Pursuant to 326 IAC 6-1-2, the particulate matter (PM) from the manufacturing activities, identified as MC3, shall be limited to 0.03 grain per dry standard cubic foot (dscf).**

- (3) B.4 (Enforceability) (a) has been removed from the rule cite, because the condition refers to all of 326 IAC 2-7-7. B.4(b) has been deleted and combined with B.4(a). OLC tells us that attorneys prefer it be worded this new way and therefore we may avoid some appeals.

##### **B.4 Enforceability [326 IAC 2-7-7]**

~~(a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.~~

~~(a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable the United States Environmental Protection Agency (U.S. EPA) and by citizens under the Clean Air Act.~~

- (4) B.8 (Duty to Supplement and Provide Information) language has been added to clarify what types of documents must be certified by the responsible official.

##### **B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]**

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

**The submittal by the Permittee does require the certification by the Aresponsible official® as defined by 326 IAC 2-7-1(34).**

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying,

revoking and reissuing, or terminating this permit, or to determine compliance with this permit. **The submittal by the Permittee does require the certification by the Responsible official as defined by 326 IAC 2-7-1(34).**

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. ~~If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.~~ If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish such confidential records **record** directly to the U. S. EPA. ~~Along with a claim of confidentiality under 40 CFR 2, Subpart B. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.~~
- (5) B.11 (Annual Compliance Certification) delete (c)(5), OAM has decided that although we have the authority, it may be cumbersome for the source to list all insignificant activities in the annual compliance certification, so the requirement is being deleted from the permit. As part of the U.S. EPA's 1997 Compliance Assurance Monitoring rule making (Federal Register Volume 62, page 54900-54947, Wednesday, October 22, 1997), the language in 40 CFR Part 70.6(c)(5)(iii)(B)) was changed from ~~A~~continuous or intermittent compliance~~@~~ to ~~A~~based on continuous or intermittent data~~@~~ The U.S. District Court of Appeals, Washington D.C. ruled against EPA's language, saying that the Clean Air Act wording of continuous or intermittent compliance had to be used. (NRDC vs. EPA, #97-1727) This change has been made to this permit to be consistent with state and federal law.

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (c) The annual compliance certification report shall include the following:
- (1) The **appropriate** identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was ~~based on~~ continuous or intermittent ~~data~~;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) ~~Any insignificant activity that has been added without a permit revision; and~~
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the ~~A~~responsible official~~@~~ as defined by 326 IAC 2-7-1(34).

- (6) B.12 (Preventive Maintenance Plan) language has been added to clarify that the PMP and the PMP extension request do not need to be certified by the responsible official. "Preventive Maintenance Plans" has been replaced with "PMPs" throughout the condition, since it has already been defined. In B.12(c) language was added that says the source has a reasonable time to provide a PMP when IDEM, OAM requests it. You may get comments on how "reasonable time" is defined. Basically "reasonable time" will be defined in the request for the PMP, and a time frame will be included.

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (b) The Permittee shall implement the PMPs as necessary to ensure that ~~lack of proper maintenance~~ **failure to implement a PMP** does not cause or contribute to a violation of

any limitation on emissions or potential to emit.

- (c) **A copy of the PMPs shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the Responsible official® as defined by 326 IAC 2-7-1(34).**
- (7) B.16 (Deviations from Permit Requirements and Conditions) paragraphs (a) & (b) have been revised so that B.16 will not conflict with C.18 (Compliance Monitoring Plan - Failure to Take Response Steps). This should clarify that failure to perform or record the required monitoring is a deviation, but if the failure is less than 5% per quarter then it doesn't have to be reported as a deviation. Then C.18(f) allows IDEM the discretion to not enforce against the failure to perform or record provided they justify the reasons for the failure.
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:
- Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- within ten (10) calendar days from the date of the discovery of the deviation, **except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**
- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.
- ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~
- (8) B.17 (Permit Modification, Reopening, Revocation and Reissuance, or Termination )  
Since it was confusing to have the responsible official certification at the end of the condition, it has been moved to (a).
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]
- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] **The notification by the Permittee does require the certification by the Responsible official® as defined by 326 IAC 2-7-1(34).**



- (9) B.21 (Operational Flexibility) the rule cite in (a)(2) was changed to reference 326 IAC 2-7-10.5. The outline in B.21(b) has been revised so that it follows the numbering system that is in the rest of the permit. B.21(e) has been deleted because it is only relevant to a few sources and is not necessary for the model. It can be added back in if a source requests it.
- B.21 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]
- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any **preconstruction** approval required by 326 IAC ~~2-4~~ **2-7-10.5** has been obtained;
- (b) ~~For each such~~ **The Permittee may make** Section 502(b)(10) of the Clean Air Act changes, ~~the required written notification shall include the following (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:~~
- (1) ~~A brief description of the change within the source~~ **The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).**
- (2) ~~The date on which the change will occur~~ **For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:**
- (A) **A brief description of the change within the source;**
- (B) **The date on which the change will occur;**
- (C) **Any change in emissions; and**
- (D) **Any permit term or condition that is no longer applicable as a result of the change.**
- ~~(e) Backup fuel switched specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.~~
- (10) B.22 (Construction Permit Requirement) has been revised to address the correct rules for construction at a TV source. It was also revised because we do not want a source to be liable for both a TV permit violation and a rule violation.
- B.22 ~~Construction Permit Requirement [326 IAC 2-]~~ **Source Modification Requirement [326 IAC 2-7-10.5]**
- 
- ~~Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, A modification, construction, or reconstruction is governed shall be approved as required by and in accordance with 326 IAC 2- the applicable provisions of 326 IAC 2-7-10.5.~~
- (11) B.24 (re-numbered as B.23)(Inspection and Entry) in order to clarify confidentiality B.24 has been revised. OAM also determined that subpart (1) and (2) of paragraph (e) were unnecessary, therefore they have been deleted.
- B.23 Inspection and Entry [326 IAC 2-7-6(2)]
- 
- Upon presentation of proper identification cards, credentials, and other documents as may be required by law, **and subject to the Permittee's right under all applicable laws and**

**regulations to assert that the information collected by the agency is confidential and entitled to be treated as such**, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
    - (1) ~~The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]~~
    - (2) ~~The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]~~
  - (12) B.24 (Transfer of Ownership or Operation) 326 IAC 2-1 has been repealed therefore this condition has been modified.
- B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]  
~~Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:~~
- (a) ~~In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.~~ **The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.**
  - (b) ~~The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~ **Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:**  
  
**Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**  
  
The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
  - (c) ~~IDEM, OAM shall reserve the right to issue a new permit.~~ **The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

(13) The following condition has been reworded to clarify language as follows:

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(b) **Except as provided in 326 IAC 2-7-19(e)**, failure to pay may result in administrative enforcement action or revocation of this permit.

(14) C.2 (Opacity) has been revised as follows to reflect the current rule language:

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary **Alternative Opacity Limitations Exemptions**), opacity shall meet the following, unless otherwise stated in this permit:

(15) C.6 (Operation of Equipment) has been revised since there may be control devices that are not required to be used to assure compliance with emission limitations.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

**Except as otherwise provided in this permit**, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

(16) C.9 (Performance Testing) has been rearranged for clarity. Language has also been added to indicate that the test protocol and the notification of the test date do not require certification by the responsible official.

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing ~~methods~~ **any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures** approved by IDEM, OAM. A test protocol, except as provided elsewhere in this permit, shall be submitted to:

no later than thirty-five (35) days prior to the intended test date. ~~The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

(b) ~~All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period. The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

(17) C.10 (Compliance Requirements) this is a new condition that refers to our general compliance authority in 326 IAC 2-1.1-11.

**Compliance Requirements [326 IAC 2-1.1-11]**

**C.10 Compliance Requirements [326 IAC 2-1.1-11]**

**The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.**

- (18) C.11 (Compliance Monitoring) has been revised to clarify that new emission units must begin compliance monitoring upon start-up. Existing units should continue any already required compliance monitoring, but have 90 days to start any CM that has been added as a result of TV review.

**C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

~~Compliance with applicable requirements shall be documented as required by this permit.~~**All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment; no more than ninety (90) days after receipt of this permit.** If due to circumstances beyond its control, the schedule cannot be met ~~that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:~~

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the Responsible official as defined by 326 IAC 2-7-1(34).

**Compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.**

- (19) Condition C.13 (Maintenance of Emission Monitoring Equipment) has been removed from the permit, based on the fact that Jasper Wood does not have any continuous emissions monitoring equipment.

~~**C.13 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**~~

- ~~(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.~~
- ~~(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.~~

- (20) C.12 (Monitoring Methods) has been revised to clarify that the monitoring and testing requirement are located in Section D of the permit.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing **required by Section D of this permit shall be performed to meet the applicable requirements of this permit shall be performed** according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

- (21) C.14 (Risk Management Plans) the instructions have been modified to show that this condition is mandatory for all Title Vs. The U. S. EPA prefers this condition to be in all permits because even if a company does not have a regulated substance currently, they could possibly modify their process and add a regulated a substance without us ever knowing it. Therefore we leave this condition in and say "if" there is a regulated substance subject to 40 CFR 68, then this condition is applicable.

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) ~~Submit: (1)~~ A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) ~~(2)~~ As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) ~~(3)~~ A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- ~~(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.~~

All documents submitted pursuant to this condition shall include the certification by the ~~A~~responsible official~~@~~ as defined by 326 IAC 2-7-1(34).

- (22) C.19 (now re-numbered C.16) (Actions Related to Noncompliance Demonstrated by a Stack Test) has been revised as follows per the Office of Legal Counsel (OLC) request .

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented. ~~IDEM, OAM shall notify the Permittee within tirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.~~
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. ~~Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.~~

Permit Reviewer: Kimberly Titzer

- (c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

- (23) C.21 (Monitoring Data Availability) has been incorporated into C.15 Compliance Monitoring Plan-Failure to Take Response Steps. The rest of Section C has been re-numbered to account for the deletion of C.21.

~~C.21 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]~~

- ~~(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.~~
- ~~(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.~~
- ~~(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.~~
- ~~(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.~~
- ~~(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.~~
- ~~(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.~~

- (24) C.18 (General Record Keeping Requirements) has been revised to be more consistent with the rules and to assure sources that the source gets a “reasonable time” to produce records no matter how or when the IDEM, OAM asks for them. C.22(c)(4) has been deleted because most of it is enforcement related and is not necessary to be in the permit. Everything else in (c)(4) that is not enforcement related is covered in other conditions.

~~C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]~~

- ~~(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~
- (c) Support information shall include, where applicable:
- (4) ~~Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps performed in accordance with the Compliance Response Plan required by Section C – Compliance Monitoring Plan – Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe~~

~~what maintenance and response steps were taken and indicate who performed the tasks..~~

- (25) C.19 (General Reporting Requirements) has been changed as follows to clarify exactly which documents require certification by the responsible official.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. **The Compliance Monitoring Report shall include the certification by the responsible official as defined by 326 IAC 2-7-1(34).**
- (d) Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. **The reports do not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).**
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. **The Emergency/Deviation Occurrence Report does not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).**

~~The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1 (34).~~

- (26) The source has requested to change all references to Aristokraft, Inc. – Plants #2/32 to Aristokraft Plant #2 and Decora Plant #3A, since Plant #32 operations have been replaced by Decora equipment. No other changes were necessary due to the name change.

# Indiana Department of Environmental Management Office of Air Management

## Technical Support Document (TSD) for a Part 70 Operating Permit

### Source Background and Description

**Source Name:** Aristokraft Inc. – Plants 2/32  
**Source Location:** One Aristokraft Square, P.O. Box 420, Jasper, Indiana 47547  
**County:** Dubois  
**SIC Code:** 2434, 2517  
**Operation Permit No.:** T037-5929-00015  
**Permit Reviewer:** Kimberly Titzer

The Office of Air Management (OAM) has reviewed a Part 70 operating permit application from Aristokraft Inc. relating to the manufacturing of wood furniture in Plants 2/32.

### Source Definition

This wood office furniture manufacturing company consists of five (5) plants:

- (1) Plant 2 is located at 14<sup>th</sup> Street and Aristokraft Square, Jasper, Indiana 47547; and
- (2) Plant 32 is located at One Aristokraft Square, Jasper, Indiana 47547.

Since the two (2) plants are located on contingent properties, have the same Standard Industrial Classification (SIC) codes and are owned by one (1) company, they will be considered one (1) source and issued one (1) Title V operating permit number: 037-5929; and one (1) source identification number: 037-00015.

### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) Surface coating operations, identified as:
  - (a) Twelve (12) surface coating operations located in Plant #2: (14<sup>th</sup> Street and Aristokraft Square, Jasper, Indiana 47547)
    - (i) Two (2) sealer booths, constructed in March 1986, identified as SB6 and SB7, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks S1 and S2.
    - (ii) Two (2) stain booths, constructed in March 1986, identified as STB2 and STB3, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks ST2 and ST1.
    - (iii) Two (2) topcoat booths, constructed in March 1986, identified as TCB10 and TCB11, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks TC1 and TC2.
    - (iv) One (1) toner booth, constructed in March 1986, identified as TB1, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and



exhausting to stack T1.

- (v) One (1) sealer touch-up booth, constructed in May 1993, identified as SB8, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stack S3.
- (vi) Two (2) topcoat touch-up booths, constructed in March 1986, identified as TCB9 and TCB12, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks TC4 and TC3.
- (vii) One (1) stain touch-up booth, constructed in March 1986, identified as STB4, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stack ST3.
- (viii) One (1) Bell parts booth, constructed in 1986, identified as PB13, using high volume low pressure (HVLP) spray guns, with a maximum capacity of 4800 units per hour, and with emissions controlled by dry filters and exhausting to stacks P1 and P2.

(2) Woodworking operations, identified as:

- (a) Woodworking operations located at Plant #2, constructed in 1974, identified as MC14, equipped with a baghouse for particulate control with a maximum capacity of 35,000 acfm and 0.01 gr/dscf, and exhausting to stack C1.
- (b) Woodworking operations located at Plant #32 (One Aristokraft Square, Jasper, Indiana 47547), constructed in 1979, identified as MC2, equipped with a baghouse for particulate control with a maximum capacity of 35,000 acfm and 0.01 gr/dscf, and exhausting to stack C1.
- (c) Woodworking operations, located in Plants 2/32, identified as MC3, equipped with a baghouse for particulate control with a maximum capacity of 61,000 acfm and 0.01 gr/dscf, and exhausting to stack C2.

### **Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR**

There are no unpermitted facilities operating at this source during this review process.

### **New Emission Units and Pollution Control Equipment Requiring ENSR**

There are no new facilities to be reviewed under the ENSR process.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
- (2) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

- (3) The following equipment related to the manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (4) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (5) Paved and unpaved roads and parking lots with public access.
- (6) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (7) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combinations of HAPs:
  - (1) 1500 gallon topcoat storage tank
  - (2) 1500 gallon sealer storage tank

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) OP 19-03-90-0267, issued on March 31, 1986.
- (2) OP 19-03-90-0268, issued on March 31, 1986.
- (3) OP 19-03-90-0269, issued on March 31, 1986.
- (4) OP 19-03-90-0270, issued on March 31, 1986.
- (5) Exempt CP 037-2098, issued on September 30, 1991.
- (6) CP 19-1847, issued on March 26, 1990.
- (7) OP 1120-0015-0351, issued on June 25, 1990.
- (8) CP Amendment 19-1847, issued on May 17, 1993.
- (9) Significant Source Modification (SSM) 037-11809, issued on March 23, 2000.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (1) OP 19-03-90-0267

Condition: This approved operating permit indicates, Article 326 IAC 8 does not have any limits applicable.

Reason not incorporated: Title V evaluation found this source to be subject to 326 IAC 8-2-12 and its requirements will be specified in the Title V permit.

- (2) OP 19-03-90-0268

Condition: This approved operating permit indicates, Article 326 IAC 8 does not have any limits applicable.

Reason not incorporated: Title V evaluation found this source to be subject to 326 IAC 8-2-12 and its requirements will be specified in the Title V permit.

Condition: This approved operating permit indicates, Article 326 IAC 8 does not have any limits applicable.

Reason not incorporated: Title V evaluation found this source to be subject to 326 IAC 8-2-12 and its requirements will be specified in the Title V permit.

(4) OP 19-03-90-0270

Condition: This approved operating permit indicates, Article 326 IAC 8 does not have any limits applicable.

Reason not incorporated: Title V evaluation found this source to be subject to 326 IAC 8-2-12 and its requirements will be specified in the Title V permit.

(5) CP 19-1847

Condition: Operation Conditions (326 IAC 6-3)

Reason not incorporated: The touch-up spray booth was permitted under 326 IAC 6-1-2 (Particulate Rules: Particulate Emissions Limitations for Nonattainment Counties), not to 326 IAC 6-3, as stated in the Construction Permit.

(6) CP 19-1847

Condition: Operation Conditions (326 IAC 8-1-6)

Reason not incorporated: The touch-up spray booth was constructed in May 1993. Pursuant to 326 IAC 8-2-1(a)(4), "facilities, construction of which commences after July 1, 1990, of the types described in sections 2 through 13 of this rule located in any county and which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Therefore 326 IAC 8-2-12 applies.

## Enforcement Issue

There are no Enforcement actions pending.

## Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively incomplete Part 70 permit application for the purposes of this review was received on May 24, 1996. Additional information received on September 3, 1996 makes the Part 70 permit application administratively complete.

A notice of completeness letter was mailed to the source on January 29, 1997.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations (See Appendix A)

## Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.

Pollutant	Potential Emissions (tons/year)
PM	Greater than 250
PM-10	Greater than 250
SO <sub>2</sub>	Less than 100
VOC	Greater than 250
CO	Less than 100
NO <sub>x</sub>	Less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP-s	Potential Emissions (tons/year)
<i>Toluene</i>	<i>Greater than 10</i>
<i>Xylene</i>	<i>Greater than 10</i>
<i>Combined HAPs</i>	<i>Greater than 125</i>

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of particulate matter less than ten (10) microns (PM<sub>10</sub>) and volatile organic compounds (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

## Actual Emissions

The following table shows the actual emissions from the source. This information reflects the information from the 1995 and 1996 emission statements and the information given in the Title V application submitted on December 18, 1996.

Pollutant (Plant #2/#32)	Actual Emissions (tons/year)
PM	1.758
PM-10	0.00
SO <sub>2</sub>	0.004
VOC	165.02
CO	0.210
NO <sub>x</sub>	0.840
HAPs	no information submitted

The table below summarizes the total potential to emit, reflecting all limits, of the significant and insignificant emission units.

	Limited Potential to Emit (tons/year)					
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
pre-1986 Plant #2/32 all woodworking, surface coating	0.03 gr/dscf	N/A	N/A	249	N/A	N/A
1993 Plant #2 Touch-up Spray booth	0.03 r/dscf	N/A	N/A		N/A	N/A

#### County Attainment Status

The source is located in Dubois County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Dubois County has been designated as attainment or unclassifiable for ozone.

#### Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) (40 CFR 60) applicable to this source.
- (b) The surface coating operations are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 60, Subpart JJ).
- (c) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture surface coating operations shall comply with the following conditions:
- (i) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
    - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent

- (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
- (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
  - (D) Use a combination of (a), (b), and (c).
- (ii) Limit VHAP emissions contact adhesives as follows:
- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.
  - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
  - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (iii) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.
- (d) Pursuant to 40 CFR 63.803, the owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:
- (i) Operator training course.
  - (ii) Leak inspection and maintenance plan.
  - (iii) Cleaning and washoff solvent accounting system.
  - (iv) Chemical composition of cleaning and washoff solvents.
  - (v) Spray booth cleaning.
  - (vi) Storage requirements.
  - (vii) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
  - (viii) Line cleaning.
  - (ix) Gun cleaning.
  - (x) Washoff operations.
  - (xi) Formulation assessment plan for finishing operations.
- (e) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (f) Record Keeping Requirements
- (i) To document compliance with 40 CFR Part 63, Subpart JJ, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in 40 CFR Part 63, Subpart JJ.
  - (ii) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
    - (A) The HAP content in pounds of VHAP per pounds of solids, as applied, for

all finishing materials and contact adhesives used.

- (B) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
  - (C) The VHAP content in weight percent of each thinner used.
  - (D) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (g) To document compliance with 40 CFR Part 63, Subpart JJ, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (h) An Initial Compliance Report to document compliance with 40 CFR Part 63, Subpart JJ and the Certification form, shall be submitted within sixty (60) days following the compliance date of December 7, 1998. The Initial Compliance Report must include data from the entire month that the compliance date falls.
- (i) A semi-annual Continuous Compliance Report to document compliance with 40 CFR Part 63, Subpart JJ and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.
  - (ii) The six (6) month periods shall cover the following months:
    - (A) January 1 through June 30.
    - (B) July 1 through December 31.
  - (iii) The reports shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

#### **State Rule Applicability - Entire Source**

##### **326 IAC 1-6-3 (Preventive Maintenance Plan)**

The source has submitted a Preventive Maintenance Plan (PMP) on December 18, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

##### **326 IAC 2-2 (Prevention of Significant Deterioration-PSD)**

The source is considered a minor PSD source because, the PM and VOC PTE emissions are limited to less than two hundred fifty (250) tons per year.

##### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM<sub>10</sub>, VOCs and SO<sub>2</sub>. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement

as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

**326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**State Rule Applicability - Individual Facilities****Surface Coating operations****326 IAC 2-2 (PSD)**

All surface coating operations shall be limited to less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

**326 IAC 6-1-2 (Particulate Rules: Particulate Emissions Limitations)**

The particulate matter (PM) from the following spray booths shall be limited to 0.03 grain per dry standard cubic foot (dscf):

- (1) Two (2) sealer booths, constructed in March 1986, identified as SB6 and SB7;
- (2) Two (2) stain booths, constructed in March 1986, identified as STB2 and STB3;
- (3) Two (2) topcoat booths, constructed in March 1986, identified as TCB10 and TCB11;
- (4) One (1) toner booth, constructed in March 1986, identified as TB1;
- (5) One (1) sealer touch-up booth, constructed in May 1993, identified as SB8;
- (6) Two (2) topcoat touch-up booths, constructed in March 1986, identified as TCB9 and TCB12;
- (7) One (1) stain touch-up booth, constructed in March 1986, identified as STB4;
- (8) One (1) Bell parts booth, constructed in 1986, identified as PB13;

Compliance is shown by the use of dry filters as control.

**326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)**

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), sealer touch-up booth (SB8) surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application



Heated Airless Spray Application  
Roller Coating  
Brush or Wipe Application  
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The source is in compliance because accepted methods of applications are used.

No other 8 rules apply to this source since this is an existing source in an attainment county.

**326 IAC 20-14 (Wood Furniture Manufacturing Operations)**

Pursuant to 326 IAC 20-14 (Wood Manufacturing Operations), the owner or operator shall comply with 40 CFR 63, Subpart JJ.

**Woodworking operations**

Aristokraft Inc. – Plants 2/32 has requested to have their woodworking operations considered insignificant. The baghouses that Aristokraft Inc. – Plants 2/32 utilize to control MC14 and MC2 fit the description for insignificant activities pursuant to 326 IAC 2-7-1(21)(G)(xxx). This Part 70 Title V permit has incorporated the new requirements for insignificant activities, as follows:

**326 IAC 2-7-1(21)(G)(xxx)      Baghouse Limitations**

The woodworking operations MC14 and MC2 shall be considered insignificant activities for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxx), including the following:

- (a) two (2) baghouses that control particulate emissions from MC14 and MC2 shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns (PM<sub>10</sub>) in excess of one-hundredth (0.01) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).
- (c) Visible emissions from the baghouses shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
  - (1) The baghouses shall be inspected.
  - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

The woodworking operations, identified as MC3, cannot be considered insignificant, because they do not fit the description for insignificant activities 326 IAC 2-7-1(21)(G)(xxix) or (xxx).

The grain loading for the baghouses are in excess of the acceptable level pursuant to the baghouse and cyclone limitations under 326 IAC 2-7-1(21)(G)(xxix) or (xxx).

**326 IAC 6-1-2 (Particulate Rules: Particulate Emissions Limitations)**

The particulate matter (PM) from the woodworking operations, identified as:

- (a) MC14 located in Plant #2; and
- (b) MC2 located in Plant #32; and
- (c) MC3 located in Plants 2/32

shall be limited to 0.03 grain per dry standard cubic foot (dscf). To be in compliance, the baghouses shall be in operation at all times the woodworking operations are exhausting to the atmosphere.

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (A) The baghouses used as particulate matter control for the woodworking operations have applicable compliance monitoring conditions as specified below:
  - (1) Visible Emission Notations
    - (a) Daily visible emission notations of the MC3 baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
    - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
    - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
    - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
    - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
  - (2) Baghouse Inspections
    - (a) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced or repaired.

- (B) The baghouses for MC14, MC2 and MC3 have applicable compliance monitoring conditions as specified below:

(1) Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because:

the baghouses for the woodworking operations must operate properly to ensure compliance with 326 IAC 6-1-2 (Process Operations) and 326 IAC 2-7 (Part 70).

- (C) The dry filters used as overspray control for the spray booths have applicable compliance monitoring conditions as specified below:

(1) Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments (See calculations page 16).

### **Conclusion**

The operation of this wood office furniture manufacturer shall be subject to the conditions of the attached proposed Part 70 Permit No. T037-5929-00015.

**Appendix A: Emissions Calculations**  
**Particulate**  
**From Woodworking operations**  
**MC14 located in Plant #2**

Company Name:	Aristokraft Inc.
Address City, IN Zip:	14 <sup>th</sup> Street and Aristokraft Square, Jasper, Indiana 47547
Title V:	T037-5929-00015
Plant ID:	Plant #2
Reviewer:	Kimberly Titzer
Date:	October 1998

**I. Potential Emissions**

The following calculations determine the potential emissions from woodworking operations attached to baghouse MC14:

- (1) Conversion of 0.01 gr/dscf to lb/hr and tons/yr to determine allowable emissions (after controls)

$$\begin{aligned}\text{Emissions PM (lb/hr)} &= (\text{gr/dscf}) \times 1 \text{ lb/7000 gr} \times (\text{air flow}) \times 60 \text{ min} \\ &= (0.01) \times 1 \text{ lb/7000 gr} \times (35,000) \times 60 \text{ min} \\ &= 3.0 \text{ lb/hr}\end{aligned}$$

$$\begin{aligned}\text{Emissions PM (tons/yr)} &= 3.0 \text{ lb/hr} \times (8760 \text{ hrs/yr}) \times (1 \text{ ton/2000 lb}) \\ &= 13.1 \text{ tons/yr}\end{aligned}$$

- (2) Conversion of allowable emissions to determine total potential emissions

$$\begin{aligned}\text{Emissions PM (lb/hr)} &= 3.0 \text{ lb/hr} / (1 - \text{baghouse control efficiency}) \\ &= 300 \text{ lb/hr}\end{aligned}$$

$$\begin{aligned}\text{Emissions PM (tons/yr)} &= 300 \text{ lb/hr} \times (8760 \text{ hr/yr}) \times (1 \text{ ton/2000 lb}) \\ &= 1,314 \text{ tons/yr}\end{aligned}$$

**Appendix A: Emissions Calculations**  
**Particulate**  
**From Woodworking operations**  
**MC2 located in Plant #32**

Company Name:	Aristokraft Inc.
Address City, IN Zip:	One Aristokraft Square, Jasper, Indiana 47547
Title V:	T037-5929-00015
Plant ID:	Plant #32
Reviewer:	Kimberly Titzer
Date:	October 1998

## I. Potential Emissions

The following calculations determine the potential emissions from woodworking operations attached to baghouse MC3:

- (3) Conversion of 0.03 gr/dscf to lb/hr and tons/yr to determine allowable emissions (after controls)

$$\begin{aligned}\text{Emissions PM (lb/hr)} &= (\text{gr/dscf}) \times 1 \text{ lb/7000 gr} \times (\text{air flow}) \times 60 \text{ min} \\ &= (0.03) \times 1 \text{ lb/7000 gr} \times (35,000) \times 60 \text{ min} \\ &= 3.0 \text{ lb/hr}\end{aligned}$$

$$\begin{aligned}\text{Emissions PM (tons/yr)} &= 3.0 \text{ lb/hr} \times (8760 \text{ hrs/yr}) \times (1 \text{ ton/2000 lb}) \\ &= 13.1 \text{ tons/yr}\end{aligned}$$

- (4) Conversion of allowable emissions to determine total potential emissions

$$\begin{aligned}\text{Emissions PM (lb/hr)} &= 3.0 \text{ lb/hr} / (1 - \text{baghouse control efficiency}) \\ &= 9,000 \text{ lb/hr}\end{aligned}$$

$$\begin{aligned}\text{Emissions PM (tons/yr)} &= 9,000 \text{ lb/hr} \times (8760 \text{ hr/yr}) \times (1 \text{ ton/2000 lb}) \\ &= 1,314 \text{ tons/yr}\end{aligned}$$

### HAP Emission Calculations

<b>Company Name:</b>	Aristokraft Inc.	
<b>Plant Location:</b>	One Aristokraft Square, Jasper, Indiana 47547	
<b>County:</b>	Dubois	
<b>Permit Reviewer:</b>	Kimberly Titzer	
<b>Date:</b>	February 1999	

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Napthalene	Napthalene (tons/year)
Reliance Vinyl Sealer	7.8	0.01	6.40	9.80%	1.28

Total State Potential Emissions					1.28
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## METHODOLOGY

$$\text{HAPS emission rate (tons/yr)} = \text{Density (lb/gal)} * \text{Gal of Material (gal/unit)} * \text{Maximum (unit/hr)} * \text{Weight \% HAP} * 8760 \text{ hrs/yr} * 1 \text{ ton}/2000 \text{ lbs}$$